

## FINAL STATEMENT OF REASONS

a) Specific Purpose of the Regulations and Factual Basis for Determination that Regulations Are Necessary

Section 33-130(a)(8)

Specific Purpose:

The specific purpose of this amendment is to expand the definition of "Adult protective services (APS) worker." Section 33-130(a)(8)(C) is adopted to allow second-year interns in a Bachelor's of Social Work or Master's program to perform the duties of an APS worker, under close supervision.

Factual Basis:

It is necessary to adopt Section 33-130(a)(8)(C) to reflect a determination made by the County Welfare Directors Association (CWDA). Under the authority of Section 10553 and 10554 of the Welfare and Institutions Code, the CWDA determined that individuals pursuing a course of study in social work, or a related field, and who are in their second year of an internship, can be assigned cases and perform the duties of an APS worker. The duties of an APS worker include: investigating allegations of elder and dependent adult abuse and providing case management activities such as service plan development, assessment, monitoring and reassessment.

Final Modification:

**In response to a comment made by Riverside County outside of the public comment period, Section 33-130(a)(8)(C) is amended to specify that interns pursuing a Master's degree in social work or related fields can be assigned cases and perform the duties of an APS worker under close supervision. This amendment is done to clarify that, under close supervision, interns pursuing a Bachelor's of Social Work need to be in their second year of internship to allow them to perform the duties of and APS worker, but interns in a Master's program can perform the APS worker duties at any time since they would have already completed their Bachelor's of Social Work degree and it is possible they would have already been interns for a year or longer.**

c) Local Mandate Statement

These regulations do impose a mandate upon local agencies, but not on school districts. There are no "state-mandated local costs" in these regulations which require state reimbursement under Section 17500 et seq. of the Government Code because any costs associated with the implementation of these regulations are

costs mandated by the federal government within the meaning of Section 17513 of the Government Code.

d) Statement of Alternatives Considered

In developing the regulatory action, CDSS did not consider any alternatives as none were presented for consideration.

The CDSS has determined that no reasonable alternative considered or that has otherwise been identified and brought to the attention of CDSS would be more effective in carrying out the purpose for which the regulations are proposed or would be as effective as and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

e) Statement of Significant Adverse Economic Impact on Business

The CDSS has determined that the proposed action will not have a significant, statewide adverse economic impact directly affecting businesses, including the ability of California businesses to compete with businesses in other states. This determination was made based on the knowledge that there would be no fiscal impact because the proposed action is limited to the broadening and inclusion of definitions to align APS policies with state code.

i) Testimony and Response

These regulations were considered at the public hearing held on May 15, 2019, in Sacramento, California. No written or oral testimony was received during the 45-day comment period from March 29, 2019 to 5:00 p.m. May 15, 2019.

**In response to a comment made by Riverside County outside of the public comment period, the Department amended Section 33-130(a)(8)(C) after the public hearing to specify that interns pursuing a Master's degree in social work or related fields can be assigned cases and perform the duties of an APS worker under close supervision.**